Ryan L. Ford, WSB# 7-4667, rford@wpdn.net WILLIAMS, PORTER, DAY & NEVILLE, P.C. PO Box 10700 Casper, WY 82602 (307) 265-0700 (307) 266-2306 (facsimile)

Attorney for Defendant

IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF WYOMING

WEIHAI TEXTILE GROUP IMPORT &)	
EXPORT CO., LTD.,)	
) Case No.: 2:21-MC-00147-SW	7S
Petitioner,)	
)	
V.)	
)	
ERUPTION HOLDINGS, INC.,)	
)	
Respondent.)	

FIRST MOTION FOR EXTENSION OF TIME TO RESPOND

Eruption Holdings, Inc., by and through undersigned counsel, pursuant to Local Rule 6.1(b), hereby requests the Court for an extension of time to respond to the petition (Doc. No. 1), as follows:

- 1. Since service of the *Petition to Confirm an International Arbitral Award*, Respondent has been seeking legal counsel, with little, to no, success.
- 2. Just today, undersigned counsel has agreed to represent Respondent in this matter.
- 3. Due to the complexity of the underlying matters, additional time will be necessary in order to gather the relevant documents and prepare the responsive pleadings.

Undersigned counsel expects this can be completed in 14 days, if not sooner, from the filing

of this request.

4. Undersigned counsel has inquired upon local counsel for Petitioner regarding

the requested extension. A response has not been received as of the filing of this pleading. Of

note, undersigned counsel has filed this pleading as the record tends to indicate that action

from the Court may be imminent.

Therefore, undersigned counsel respectfully request that the Court issue an order

directing that Respondent has until the end of the day on August 9, 2021.

RESPECTFULLY SUBMITTED this 26th day of July, 2021.

ERUPTION HOLDINGS, INC.,

a Wyoming corporation,

Plaintiff.

By: <u>/s/ Ryan L. Ford</u>

Ryan L. Ford, WSB# 7-4667

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